



June 7, 2011

**EX PARTE**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; High-Cost Universal Service Support, WC Docket No. 05-337; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

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Dear Ms. Dortch:

On June 3, 2011, Alan Buzacott (Verizon), Jeff Lanning (CenturyLink), Peter Copeland (CenturyLink—via phone), Joel Lubin and Saikat Sen (AT&T), Mike Saperstein (Frontier), Ken Mason (Frontier—via phone), Cesar Caballero (Windstream), and the undersigned met with Michael Steffen of the FCC's Office of General Counsel, Kevin King of the FCC's Office of Strategic Planning and Policy Analysis (via phone), Sharon Gillett, Rebecca Goodheart, Deena Shetler, Victoria Goldberg, Doug Slotten, Dan Ball, Brad Gillen, Carol Matthey, Steve Rosenberg, and Rohit Dixit of the FCC's Wireline Competition Bureau.

Our discussion centered on sizing and understanding shifts in access revenue that would occur as part of any plan to reform intercarrier compensation. In particular, we discussed the operation of an AT&T industry model that has been in use for some time to estimate various options for intercarrier compensation reform. Inputs to that model include interstate and intrastate access revenues, lines, minutes of use and local rates for 1,431 incumbent LEC study areas across the United States. We discussed various sources of input data and verification, as well as projecting lines and minutes of use on a going-forward basis. The model includes CCL and both tandem and end office switching and transport revenue elements. We also discussed that in 2009 incumbent LECs' total switched access revenues, as reported in Form 499A, were approximately \$6.0 billion including both originating and terminating revenues as well as interstate and intrastate service.

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Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Banks". The signature is fluid and cursive, with the first name "Jonathan" and last name "Banks" clearly legible.

Jonathan Banks

c: Michael Steffen  
Kevin King  
Sharon Gillett  
Rebecca Goodheart  
Deena Shetler  
Victoria Goldberg  
Doug Slotten  
Dan Ball  
Brad Gillen  
Carol Matthey  
Steve Rosenberg  
Rohit Dixit